

# Automated Commercial Environment- Requirements Recommendation

<b>Date:</b>	September 5, 2001
<b>Number:</b>	ITD-HL-009
<b>Requestor:</b>	ITDS Sub-Committee
<b>Customs Co-Chair:</b>	Allison Suliveras
<b>Trade Co-Chairs:</b>	Tom Anastasi & Sandra Scott

## Requirement

### Rollout Plan:

Develop a comprehensive strategy for roll-out of ITDS to the various participating government agencies (PGA's). This strategy must address the following elements:

1. Establishment of ITDS as the "single window" for collection of international trade data by federal agencies.
2. Establishment of criteria for determination of the order in which the various PGA functionality will be implemented.
3. Establishment of requirements justification standards for PGA's.
4. Establishment of level-of-service requirements for PGA's.
5. A plan to pursue legislation or an Executive Order to ensure that the ITDS Board of Directors has the authority to implement the strategy.

See the attachment for additional discussion of these elements.

## Business Need

### Realization of ITDS trade facilitation goals is dependent on:

- the status of ITDS as the "single window" for collection of international trade data by federal agencies;
- careful coordination of implementation of Customs ACE functions and PGA ITDS functions;
- establishment of PGA requirements that are not so onerous as to dilute the trade facilitation benefits that would otherwise be delivered by ACE and ITDS; and
- adequate operational and systems support by PGA's.

## Technical Need

## Benefits

### The benefits of successful implementation of ITDS include:

- Reduced cost and burden of processing international trade transactions for both the private trade community and the government.
- A standard data set and a single system for import, export, and transit procedures relative to the goods involved and the transportation employed (conveyances and crew).
- Improved compliance with government trade requirements (e.g., public health and safety rules, export controls, etc.)
- More accurate, thorough, and timely international trade data.

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### Risks

**Without a comprehensive strategy any of the following may result in failure to realize ITDS trade facilitation goals:**

- Uncoordinated establishment of new PGA data collection procedures and systems;
- Failure to timely implement PGA functions needed to support processes as they are implemented in ACE;
- PGA imposition of requirements that would undermine the trade facilitation benefits that would otherwise be delivered by ACE and ITDS; or
- Failure of a PGA to provide adequate operational and systems support to ensure reliable and efficient operation of ITDS and the operational procedures supported by ITDS.

### Related Subcommittees

Entry; Manifest

**Priority:**    **Critical**    ☒        **High**        ☐        **Medium**        ☐        **Low**        ☐

### Customs Use Only

Approved ☐

Not Approved ☐

Further Evaluation Required ☐

**A comprehensive strategy for roll-out of ITDS to include the functions required by the various participating government agencies (PGA's) must address the following elements:**

**1. Establishment of ITDS as the “single window” for collection of international trade data by federal agencies.**

- Require agencies to participate in ITDS by legislation or an Executive Order suspending implementation by federal agencies of any new international trade data collection procedures or systems that are not developed in coordination with ITDS.
- ITDS should not directly provide data to any agency that does not actively participate in ITDS development.

**2. Establishment of criteria for determination of the order in which the various PGA functionality will be implemented.**

- Development of the ITDS Pilot has demonstrated that as agency processes are integrated many operational and data requirement issues must be resolved among the participating agencies and the affected elements of the trade community. As a practical matter, agency requirements will need to be integrated into ITDS gradually.
- The ITDS Board of Directors should determine the timing of implementation of agency functions in ITDS.
- The primary objective in making such determinations should be to develop a schedule that is consistent with and supports the Customs ACE implementation plan.

**Additional factors that should be considered in scheduling implementation of agency requirements include:**

- Dependence of current agency processes on Customs systems;
  - Readiness of agency systems to support interface requirements (if any);
  - Agency impact (based on scheduled ACE coverage of commodities, locations, modes of transportation, etc.) on trade operations; and
  - Legislated requirements and executive administration priorities.

As plans are developed for direct intergovernmental exchange of transactional or aggregated data, the ITDS Board of Directors should determine the timing of implementation of foreign government agency functions in ITDS based on the same criteria used to determine timing of domestic agency implementations.

**3. Establishment of requirements justification standards for PGA's.**

The ITDS Board of Directors will coordinate with the Customs Modernization Office (CMO) to identify and recruit management officials from all government agencies that will have a stake in the ITDS program. The Board will act as a liaison between the CMO, the PGA's and the trade community.

**The ITDS Board of Directors should define a standard of preparation that it will require PGA's to meet. This standard should include, but not be limited to, the following elements:**

- Appointment of a responsible single point of contact;
- Business case;
- **High level user requirements;**
- Documented business process re-engineering that takes into consideration the overall plan for ITDS operations;
- **Legal authority for data collection;**
- **Cost-benefit justification of proposed data collection methodology;**
- Justification and harmonization of any new data elements to be added to the ITDS standard data set;
- Agency budget resources adequate to support implementation;

- Availability of agency subject matter experts for specification and negotiation of detailed user requirements and operational procedures.

Detailed content, format and timing requirements for documentation of each of these elements should be published by the ITDS Board of Directors.

The ITDS Board of Directors should evaluate and approve submitted documentation. Board approval of appropriate documentation should be required as a prerequisite for agency function development to proceed to various development milestones.

The same standards should apply to initial implementation of agency functions and to subsequent changes and new functions.

#### **4. Establishment of level-of-service requirements for PGA's.**

The ITDS Board of Directors should require PGA's to provide a level of systems and operational service adequate to ensure reliable and efficient operation of ITDS and the operational procedures supported by ITDS.

The ITDS Board of Directors should establish appropriate system-wide minimum standards in areas such as system response times, uniform interfaces, risk management, standardized architecture, account-based processing, etc. These standards should serve as a mandatory baseline for all PGA's. Documentation of suitable performance measures must be integrated in detailed user requirements and operational procedures.

For PGA's that will be performing "live targeting" which may result in the need for an examination, there should be standards set for staffing availability. All agencies need to be able to respond in a timely manner and be liable for performing their own exams. Agencies should also be required to utilize risk management principles for selectivity and develop account-based processing where appropriate.

### **5. A plan to pursue legislation or an Executive Order to ensure that the ITDS Board of Directors has the authority to implement the strategy.**

#### **Legislation or an Executive Order should be sought to:**

- Suspend implementation by federal agencies of any new international trade data collection procedures or systems that are not developed in coordination with ITDS.
- Stipulate that ITDS will not directly provide data to any agency that does not actively participate in ITDS development.

#### **Authorize the ITDS Board of Directors to:**

- Determine the timing of implementation of federal and foreign agency functions in ITDS;
- Define a standard of preparation that it will require PGA's to meet;
- Evaluate and approve submitted documentation before development proceeds to various development milestones;
- Establish appropriate levels of systems and operational service that PGA's must provide.

